

Plaintiff United States Securities and Exchange Commission (“SEC”) respectfully files this motion to compel discovery against Defendants John M. Fife (“Fife”) and entity Defendants Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants”). In support of this motion, the SEC states as follows:

1. In late June 2023, the SEC propounded its second set of document requests to Defendants. The SEC subsequently narrowed the scope of those requests to address 52 of Defendants' transactions. The SEC has identified those 52 transactions by highlighting them in yellow in Exhibit B (provisionally filed under seal) to the SEC's Memorandum in Support of this

Motion. The SEC derived this Exhibit B from the spreadsheet that Defendants attached to their responses to the SEC's second set of interrogatories.

2. Based on Defendants' own business records and other available information, the SEC believes that these 52 transactions are convertible debt transactions within the scope of the SEC's Complaint.

3. The SEC's second set of document requests seek four types of documents for these 52 transactions: 1) the current version of Defendants' cash out from sales spreadsheet; (2) Quickbooks reports; (3) conversion notices; and (4) Google Drive sheets.

4. On July 26, 2023, Defendants responded to the SEC's second set of documents requests and stated that Defendants were refusing to produce any responsive documents. Subsequently, during the meet-and-confer process, Defendants agreed to produce responsive documents for nine transactions, leaving 52 transactions in dispute.

5. In accordance with Local Rule 37.2, counsel for the SEC telephonically conferred with counsel for the Defendants on August 9, 2023, in a good-faith effort to resolve the differences raised in this motion, but were unable to reach an accord.

6. Accordingly, the SEC respectfully moves this Court to compel Defendants to provide this discovery, which is relevant and proportional to the needs of the case.

7. The SEC is contemporaneously filing a Memorandum in Support of this motion, with exhibits thereto, as well as a Motion for Leave to File Under Seal Exhibits B, F, G, I, J and K to the Memorandum in Support.

WHEREFORE, the SEC respectfully requests that the Court: (i) grant this Motion in its entirety; (ii) order Defendants to produce documents responsive to the SEC's June 2023 second set of document requests for the 52 transactions highlighted in yellow in Exhibit B to the SEC's

Memorandum in Support of this Motion: and (iii) grant such other and further relief as this Court deems just.

Dated: September 19, 2023

Respectfully submitted,

**UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION**

/s/ Eric M. Phillips

By: One of Its Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on September 19, 2023, he caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the Court's CM/ECF system, which shall send notification of such filing to the following counsel of record:

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